

McCormick, Barstow, Sheppard,  
Wayte & Carruth LLP  
Jonathan W. Carlson  
Nevada Bar No. 10536  
*jonathan.carlson@mccormickbarstow.com*  
Cheryl A. Grames  
Nevada Bar No. 12752  
*cheryl.grames@mccormickbarstow.com*  
7160 Rafael Rivera Way, Suite 320  
Las Vegas, Nevada 89113  
Telephone: (702) 949-1100  
Facsimile: (702) 949-1101

Attorneys for Defendant  
CSAA General Insurance Company

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

RAN ZOOKIN, an individual,

Plaintiff,

v.

CSAA GENERAL INSURANCE  
COMPANY, a foreign corporation; DOE  
EMPLOYEES I-V; ROE CORPORATIONS I-  
V,

Defendants.

Case No. 2:24-cv-00914-GMN-MDC

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY DEADLINE  
(FIRST REQUEST)**

Defendant CSAA GENERAL INSURANCE COMPANY, by and through its attorneys of record of the law firm McCORMICK, BARSTOW, SHEPPARD, WAYTE & CARRUTH LLP, and Plaintiff RAN ZOOKIN, by and through his attorneys of record of VAN LAW FIRM, hereby file this Stipulation and Order to Continue Discovery Deadline Dates (First Request), specifically seeking to extend the discovery deadline and dates related thereto by ninety days (90) days. The parties seek this extension pursuant to LR IA 6-1, 6-2, and LR 26-3.

**I. DISCOVERY COMPLETED BY THE PARTIES:**

1. The FRCP 26(f) conference between the parties in this matter was held on January 28, 2025.
2. Defendant served its initial disclosures on August 18, 2024.

- 1           3.       Plaintiff served his initial disclosures on October 17, 2024.
- 2           4.       Defendant served Interrogatories, Request for Production of Documents, and
- 3 Requests for Admissions on Plaintiff on January 28, 2025.
- 4           5.       Plaintiff served responses to Defendant's discovery on March 27, 2025;
- 5           6.       Defendant noticed Plaintiff's deposition on March 31, 2025 for April 24, 2025.
- 6           7.       Defendant served a supplement to its initial disclosures on April 1, 2025.
- 7           8.       Plaintiff served a supplement to his initial disclosures on April 11, 2025.
- 8           9,       Defendant served a supplement to its initial disclosures on April 17, 2025.
- 9           10.      Defendant served a supplement to its initial disclosures on May 13, 2025.
- 10          11.      Defendant re-noticed Plaintiff's deposition on May 22, 2025 for July 29, 2025.
- 11          12.      Plaintiff served Interrogatories, Requests for Production of Documents, and Requests
- 12 for Admissions on Defendant May 23, 2025.
- 13          13.      Defendant served a supplement to its initial disclosures on June 8, 2025.
- 14          14.      Plaintiff served his Initial Expert Witness Disclosures on June 20, 2025.
- 15          15.      Defendant is currently preparing responses to Plaintiff's discovery responses for
- 16 service on or before July 7, 2025.

17 **II.     DISCOVERY WHICH REMAINS TO BE COMPLETED:**

18           Depositions: The parties anticipate proceeding with depositions of the parties, pertinent fact

19 witnesses and Plaintiff's medical providers.

20           Expert Witnesses: The parties also intend to disclose expert witnesses and to depose said

21 expert witnesses thereafter.

22           Written Discovery: The parties anticipate additional written discovery following depositions

23 and expert witness disclosures.

24 **III.   REASON WHY DISCOVERY WAS NOT SATISFIED OR COMPLETED WITHIN**

25 **THE TIME LIMIT SET BY THE DISCOVERY PLAN:**

26           The parties have been working diligently to develop their respective cases in chief. However,

27 the impact of (1) the Court's order on Defendant's Motion to Dismiss certain claims in Plaintiff's

28 Second Amended Complaint and (2) the timing of Defendant's responses to Plaintiff's written

1 discovery (July 7, 2025, per extension), has shown the parties that to engage in expert discovery at  
2 this juncture will waste resources because those opinions will have to be repeatedly supplemented.  
3 In the interest of civil discourse between opposing counsel and to avoid each side having to  
4 draft/respond to emergency motions, counsel seek an extension of the deadlines. Such resolution  
5 will enable the party depositions, fact witness depositions, and expert witness depositions proceed  
6 in a sensible manner. Such resolution will also ensure more meaningful expert witness discovery at  
7 a lower cost.

8 **IV. GOOD CAUSE EXISTS TO GRANT THE REQUESTED EXTENSION**

9 The parties' efforts to minimize cost and to avoid the need to seek judicial relief as to  
10 impending motions and expert witnesses serve the purpose and stated goal at FRCP 1, "to secure  
11 the just, speedy, and inexpensive determination of every action and proceeding." These efforts  
12 provide the Court good cause to grant the parties' request for extension.

13 The parties submit the instant stipulation within the timeframe outlined by LR 26-3.

14 **V. THE CURRENT SCHEDULE FOR COMPLETION OF ALL REMAINING**  
15 **DISCOVERY:**

16 The parties request that the pertinent discovery deadlines set forth in the Court's Scheduling  
17 Order be continued ninety (90) days, as follows:

18 A. ESTIMATE OF TIME REQUIRED FOR DISCOVERY: Pursuant to Local Rule 26-  
19 1(b)(1), and with the Court's approval, discovery shall be completed on or before **December 22,**  
20 **2025.**

21 B. EXPERT DISCLOSURES: Unless otherwise stated herein, and the Court so orders,  
22 Defendant will serve its initial and rebuttal expert witness disclosures on **October 23, 2025.** Plaintiff  
23 will serve his rebuttal expert witness disclosures thirty (30) days thereafter on **November 24, 2025.**

24 C. DISPOSITIVE MOTIONS: Unless otherwise stated herein, and the Court so orders,  
25 the date for filing dispositive motions shall be thirty (30) days after the discovery cut-off date, but  
26 not later than **January 22, 2026.**

27 D. PRETRIAL ORDER: Unless otherwise stated herein, and the Court so orders, the  
28 joint pretrial order shall be filed thirty (30) days after the date set for filing dispositive motions, but

1 not later than **February 23, 2026**, or thirty (30) days after the Court issues its order disposing  
2 of the dispositive motion(s).

3 DATED this June 30, 2025.

4 McCORMICK, BARSTOW, SHEPPARD,  
5 WAYTE & CARRUTH LLP

6 /s/ Cheryl A. Grames

7 Jonathan W. Carlson  
8 Nevada Bar No. 10536  
9 Cheryl A. Grames  
10 Nevada Bar No. 12752  
11 7160 Rafael Rivera Way, Suite 320  
12 Las Vegas, Nevada 89113  
13 Tel. (702) 949-1100  
14 *Attorneys for Defendant CSAA*  
15 *General Insurance Company*

16 DATED this June 30, 2025.

17 VAN LAW FIRM

18 /s/ Noah A. Duran

19 Noah A. Duran  
20 Nevada Bar No. 15033  
21 1290 S. Jones Blvd.  
22 Las Vegas, Nevada 89146  
23 Tel. (702) 900-9000  
24 *Attorneys for Plaintiff Ran Zookin*

25 **IT IS SO ORDERED.** The parties'  
26 Stipulation for Extension of Time (ECF NO.  
27 44) is DENIED without prejudice. Extension  
28 stipulations must include the current discovery  
and pre-trial deadlines. The parties are  
granted leave to please file an amended  
stipulation that includes the current deadlines  
together with the proposed extensions.

Date: 7-1-25

  
HON. MAXIMILIANO D. COUVILLIER III  
U.S. Magistrate Judge

012428-000433 11808065.1